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PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the Application of)
Applicants: James Benjamin Williams et al.)
Serial No. 10/797,889) Examiner
Filed: March 10, 2004) Thu Thao Haven
Title: Methods for issuing, distributing, managing and)
redeeming investment instruments providing)
securitized annuity options) Art Unit 3624

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

FAX TRANSMISSION COVER LETTER

- 13 SHEETS TOTAL -

The attached Response to Final Rejection and Request for Advisory Action (12 pages) is being transmitted via facsimile to the central facsimile number of United States Patent and Trademark Office, (571) 273-8300, on January 27, 2006.

Respectfully submitted,



Dated: January 27, 2006

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Response to Final Rejection and Request for Advisory ActionStatus of this application

Claims 1-13 and 15-22 are pending (because of an initial claim numbering error, no claim number 14 was ever submitted). In the Office Action mailed on January 11th, the Examiner finally rejected all claims based on the previously cited Lewis et al. Patent 6,611,815 (hereinafter "Lewis"). This response is being transmitted to the Office within two months of the mailing date of the outstanding final rejection, and requests an advisory action.

Response to the Final Rejection

In the outstanding final rejection, the Examiner found that "*Applicant's arguments filed October 28, 2005 have been fully considered but they are not persuasive.*" The Examiner made specific comments concerning those prior arguments in paragraphs A) and B), and those comments are reproduced below in *italics*, followed by applicant's responsive remarks.

Paragraph A states: